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To: Floyd Nichols/EPR/R8/USEPA/US@EPA
cc
bcc
Subject: Vermiculite Intermountain

Here are the UDEQ/DERR comments developed with our Toxicologist regarding cleanup standards for the UP&L property:

The UDEQ/DERR would ultimately prefer that:

- Cleanup standards for the UP&L property remain consistent with the current standards used in the Libby, Montana NPL site.
- Cleanup standards for the UP&L property remain consistent with the cleanup standards proposed for the Intermountain Insulation property.

While acknowledging that there are inherent dangers of electrical hazards presented in areas of the UP&L property that may affect cleanup/excavation activities, these dangers are not present in the "vacant lot" portion on the east side of the property and should not prevent UP&L from complying with the cleanup standards established at the Libby NPL site. Depending on the current standard for the Libby NPL site, the UDEQ/DERR's preferred cleanup standards are in order:

- 1.) Non-detect. Excavate to non-detect in clearance samples and backfill.
- 2.) 1% Standard. Excavate to a 1% Asbestos level (State definition for ACM), set down a protective barrier and backfill.
- 3.) Excavate to depth. Excavate material to a determined depth, set down protective barrier and backfill. Given the sampling data that detected the vermiculite ore rock down to a depth of 9 feet this option would not suitably address the contamination issue for this property.

If you have any questions, feel free to call.

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